

STATE OF NORTH CAROLINA
COUNTY OF MECKLENBURG

IN THE GENERAL COURT OF JUSTICE
SUPERIOR COURT DIVISION
CA No.: 3:24-cv-01002

SALLAMONDRA ROBINSON,)
INDIVIDUALLY AND AS)
PERSONAL REPRESENTATIVE OF)
THE ESTATE OF SHANQUELLA)
ROBINSON, DECEASED.)
)
Plaintiff,)
v.)
)
E'MANI GREEN,)
ALYSSE HYATT,)
MALIK DYER,)
WENTER DONOVAN,)
KHALIL COOKE,)
NAZEER TYREE WIGGINS,)
UNITED STATES DEPARTMENT OF)
STATE, AND THE)
FEDERAL BUREAU OF INVESTIGATION,)
)

Defendants.

/

**PLAINTIFF'S RESPONSE TO DEFENDANTS' ALYSSE HYATT AND WENTER
DONOVANS' MOTION TO DISMISS FOR IMPROPER VENUE**

NOW COMES, Plaintiff, by and through undersigned counsel, respectfully requests this Honorable Court to dismiss the Defendants' Motion or in the alternative for an Order requiring Defendant Hyatt and Defendant Donovan to certify, through affidavit, which evidence is unobtainable and the necessity of such information. Plaintiff files contemporaneously herewith a Memorandum in Support of Plaintiff's Response.

Dated: March 10, 2025

Respectfully submitted,

/s/ Sue-Ann Robinson
Sue-Ann Robinson, Esq.
FBN: 29463
614 S. Federal Highway
Fort Lauderdale, FL 33301
Telephone: (754) 801-0897
Email: sueann@frontlinefirm.com

/s/ Gabrielle Higgins
Gabrielle Higgins, Esq.
FBN: 1025840
614 S. Federal Highway
Fort Lauderdale, FL 33301
T: 754-801-0897
gabrielle@frontlinefirm.com
Pro hac vice forthcoming

WALLIS, BOWENS, AVERHART & ASSOCIATES, PLLC
/s/ Saleisha Nadia Averhart
Saleisha Nadia Averhart, Esq. (NC State Bar No. 40178)
5500 McNeely Drive, Ste. 102
Raleigh, North Carolina 27612
T: 919-741-6798
saleisha@wbaalaw.com